## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA, ex rel.

DILBAGH SINGH, M.D., : Civil Action No. 04-186E

PAUL KIRSCH, M.D., :

V. RAO NADELLA, M.D., and

MARTIN JACOBS, M.D.,

: The Honorable Judge Cohill

Relators,

:

v.

BRADFORD REGIONAL
MEDICAL CENTER,

V & S MEDICAL ASSOCIATES, LLC,

PETER VACCARO, M.D.,

KAMRAN SALEH, M.D., : (Filed Electronically)

and DOES I through XX,

:

Defendants. :

## APPENDIX OF EXHIBITS IN SUPPORT OF V & S MEDICAL ASSOCIATES, LLC, PETER VACCARO, M.D. AND KAMRAN SALEH, M.D.'S MOTION FOR SUMMARY JUDGMENT

- EXHIBIT A Selected Pages from the Deposition Transcript of Kamran Saleh, M.D., dated August 9, 2007.
- EXHIBIT B Affidavit of Kamran Saleh.
- EXHIBIT C Affidavit of Peter Vaccaro.
- EXHIBIT D Selected Pages from the Deposition Transcript of Peter Vaccaro, M.D., dated August 9, 2007.
- EXHIBIT E Selected Pages from the Deposition Transcript of the Corporate Designee of Bradford Regional Medical Center, dated July 26, 2007.
- EXHIBIT F Policy On Physicians With Competing Financial Interests, dated May 23, 2001 (HOSP 0004321-0004333).
- EXHIBIT G Selected Pages from the Deposition Transcript of George Leonhardt, dated April 1, 2008.
- EXHIBIT H Selected Pages from the Deposition Transcript of Edward Kabala, dated April 3, 2008.

- EXHIBIT I Equipment Sublease, dated October 1, 2003 (V&S 00300-00318).
- EXHIBIT J Selected Pages from the Deposition Transcript of Sal A. Barbera, dated July 1, 2008.
- EXHIBIT K Report of Charles T. Day, CPA (HOSP 0007431-0007448).
- EXHIBIT L Letter from Drs. Saleh and Vaccaro to George Leonhardt, dated October 2, 2003 (HOSP 0004229).
- EXHIBIT M V&S Billing Statements and Receipts (V&S 03154-03170).
- EXHIBIT N Selected Pages from the Deposition Transcript of V. Rao Nadella, M.D., dated August 20, 2007.
- EXHIBIT O Selected Pages from the Deposition Transcript of Dilbagh Singh, M.D., dated August 21, 2007.
- EXHIBIT P Selected Pages from the Deposition Transcript of Martin David Jacobs, M.D., dated August 21, 2007.
- EXHIBIT Q Selected Pages from the Deposition Transcript of Paul B. Kirsch, M.D., dated August 20, 2007.
- EXHIBIT R Expert Report of James H. Jordon, CFA, ASA, dated June 5, 2008.
- EXHIBIT S Selected Pages from the Deposition Transcript of James H. Jordon, dated July 2, 2008.

Respectfully submitted,

FOX ROTHSCHILD LLP

Dated: September 10, 2008 s/Carl J. Rychcik

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Attorneys for Defendants V & S Medical Associates, LLC Peter Vaccaro, M.D. Kamran Saleh, M.D.

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of September, 2008, a true and correct copy of the foregoing Appendix of Exhibits in Support of V & S Medical Associates, LLC, Peter Vaccaro, M.D. and Kamran Saleh, M.D.'s Motion for Summary Judgment was served via the Court's ECF transmission facilities upon the following counsel of record:

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s/Ca	ırl J. Rv	<i>i</i> chcik